

United States District Court  
District of Massachusetts

F.B.,  
G.G.

*Plaintiffs*

v.

Civil Action No.: 1:22-cv-11851

MELVIS C. ROMERO, former prison guard, in his individual and official capacity; MASSACHUSETTS DEPARTMENT OF CORRECTION (DOC); WELLPATH; CAROL MICI, Commissioner of Correction, of the Massachusetts Correctional Institution at Framingham (MCI Framingham) in her individual and official capacity; SUZANNE THIBAUT, former superintendent, in her individual and official capacity; KRISTIE LADOUCEUR, former superintendent of MCI Framingham, in her individual and official capacity; PATRICIA MALANSON, former Deputy Superintendent of Operations at MCI Framingham, in her official and individual capacity; KEITH NANO, former Deputy Superintendent of Operations at MCI Framingham, in his official and individual capacity; JOHN DEAN, former Deputy Superintendent at MCI Framingham, in his official and individual capacity; RYAN DONLON, Director of Security at MCI Framingham, in his individual and official capacity; ROBERT TARANTINO, Special Housing Unit Captain at MCI Framingham, in his individual and official capacity; ROBERT LEFORT, the Housing Unit Captain at MCI Framingham, in his individual and official capacity; DAVID TUCKER, Commander of Inner Perimeter Security (IPS) at MCI Framingham, in his individual and official capacity; MORGANN MCGINTY, Director of Mental Health Services, in her individual and official capacity, JOHN DOE 1-10, past or present MCI Framingham employees, in their individual and official capacity

*Defendants*

**MOTION FOR LEAVE TO FILE THE PLAINTIFFS' NAMES UNDER SEAL AND TO  
USE INITIALS IN PUBLIC FILINGS**

Plaintiffs move this Court to permit them to file their names under seal and to use initials in public filings. As grounds, the Plaintiffs in this case were victims of sexual assault and they seek to preserve their privacy so to prevent embarrassment and to avoid the opprobrium which is sometimes hurled at such victims who make accusations in this type of case.

Respectfully submitted  
F.B.,  
G.G.  
By their Attorneys,

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October 31, 2022

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